

system controls the location, access, and transfer of information between client terminals and the servers through the communication paths connecting the control and management agent system of each of the client terminals and the servers to the information management system. Notably, Raz does not expressly describe nor suggest an apparatus, or a method, for choosing an error proofing technique to fit a given application, or storing an error proofing technique within a database.

Buzsaki describes a method for executing a workflow (100) that requires input from a role. The workflow is executed in a first process (216) until an operation requiring input from a role is detected. Continuation information is stored indicating the workflow operation requiring input from the role. The request for input from the role is then communicated to a computer-user identified with the role. Later, after receiving input from the computer user, execution of the workflow is resumed in a second process (217) based on the continuation information, starting at the operation that required input from the role. The operation that required input from the role is executed based on the response received from the computer-user identified with the role. Notably, Buzsaki does not describe nor suggest a plurality of tables, wherein at least one of the tables includes at least one error proofing example and meta-data defined by a user when creating an error proofing example. Rather, at column 8, lines 13-61, Buzsaki describes an error column (540) which only identifies actual errors encountered during execution of the workflow activity and does not include any meta-data defined by the user when the error proofing example was created.

Applicants respectfully submit that the Section 103 rejection of the presently pending claims is not a proper rejection. Obviousness cannot be established by merely suggesting that it would have been an obvious to one of ordinary skill in the art to modify Raz according to the teachings of Buzsaki. More specifically, it is respectfully submitted that a prima facie case of obviousness has not been established. As explained by the Federal Circuit, "to establish obviousness based on a combination of the elements disclosed in the prior art, there must be some motivation, suggestion or teaching of the desirability of making the specific combination that was made by the applicant." In re Kotzab, 54 USPQ2d 1308, 1316 (Fed. Cir. 2000). MPEP 2143.01.

Moreover, the Federal Circuit has determined that:

[I]t is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the prior art so that the claimed invention is rendered obvious. This court has previously stated that "[o]ne cannot use hindsight reconstruction to pick and choose among isolated disclosures in the prior art to deprecate the claimed invention."

In re Fitch, 23 USPQ2d 1780, 1784 (Fed. Cir. 1992). Further, under Section 103, "it is impermissible . . . to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art." In re Wesslau, 147 USPQ 391, 393 (CCPA 1965). Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants' disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion nor motivation to combine the cited art, nor any reasonable expectation of success has been shown.

Although it is asserted within the Office Action that Raz teaches the present invention except for disclosing the database table comprising at least one error proofing example, and that Buzsaki discloses the database table comprising at least one error encountered column, no motivation nor suggestion to combine the cited art has been shown. Since there is no teaching nor suggestion in the cited art for the claimed combination, the Section 103 rejection appears to be based on a hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible, and for this reason alone, Applicants request that the Section 103 rejection of Claims 1-20 be withdrawn.

Furthermore, Applicants respectfully submit that no motivation for the combination can be found within Raz and Buzsaki, as Raz and Buzsaki teach away from the present invention as well as from each other. Raz describes an information management system for dynamically controlling the location, access, and transfer of information between client terminals and servers, but does not describe nor suggest an apparatus or a method for choosing an error proofing technique to fit a given application, or storing an error proofing technique within a database. In contrast to Raz, as well as the present invention, Buzsaki

describes a method for executing a workflow procedure that requires input from a user, but Buzsaki does not describe nor suggest an apparatus or a method for choosing an error proofing technique to fit a given application, or storing an error proofing technique within a database. Rather Buzsaki describes an error column that is only used to identify errors encountered during execution of the workflow.

If art "teaches away" from a claimed invention, such a teaching supports the nonobviousness of the invention. U.S. v. Adams, 148 USPQ 479 (1966); Gillette Co. v. S.C. Johnson & Son, Inc., 16 USPQ2d 1923, 1927 (Fed. Cir. 1990). In light of this standard, it is respectfully submitted that the cited art, as a whole, is not suggestive of the presently claimed invention. More specifically, Applicants respectfully submit that the combination of Buzsaki and Raz teaches away from the present invention.

Further, and to the extent understood, no combination of Raz and Buzsaki, describes or suggests the claimed combination, and as such, the presently pending claims are patentably distinguishable from the cited combination. Specifically, Claim 1 recites a system comprising "a plurality of clients...a server comprising a plurality of servlets, at least some of said servlets providing at least one of a database and server access capability to each said client...said database comprising a plurality of tables, at least one of said tables comprising at least one error proofing example and meta-data defined by a user when creating an error proofing example...."

The combination of Raz and Buzsaki does not describe nor suggest a system that includes a plurality of clients, a server that includes a plurality of servlets, at least some of the servlets providing at least one of a database and server access capability to each client, the database includes a plurality of tables, wherein at least one of the tables includes at least one error proofing example and meta-data defined by a user when creating an error proofing example. Specifically, no combination of Raz and Buzsaki describes or suggests a table that includes at least one error proofing example, and meta-data defined by a user when creating an error proofing example. Accordingly, for at least the reasons set forth above, Claim 1 is submitted to be patentable over Raz in view of Buzsaki.

Claims 2-12 depend, directly or indirectly, from independent Claim 1. When the recitations of Claims 2-12 are considered in combination with the recitations of Claim 1,

Applicants submit that dependent Claims 2-12 likewise are patentable over Raz in view of Buzsaki.

Claim 13 recites a method for identifying an error proofing technique for a given application using a web-based system, wherein the system includes a plurality of clients including a plurality of user interface classes, and a database including a plurality of tables including at least one example of an error proofing technique and user defined meta-data, and wherein the method includes the step of “choosing an error proofing technique to fit the given application.”

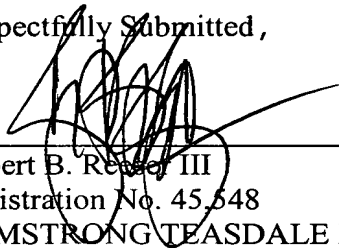
No combination of Raz and Buzsaki describes nor suggests a method for identifying an error proofing technique for a given application using a web-based system, wherein the system includes a plurality of clients including a plurality of user interface classes, and a database including a plurality of tables including at least one example of an error proofing technique and user defined meta-data, and wherein the method includes the step of choosing an error proofing technique to fit the given application. Specifically, no combination of Raz and Buzsaki describes or suggests a method that includes the step of choosing an error proofing technique to fit the given application. Accordingly, for at least the reasons set forth above, Claim 13 is submitted to be patentable over Raz in view of Buzsaki.

Claims 14-20 depend, directly or indirectly, from independent Claim 13. When the recitations of Claims 14-20 are considered in combination with the recitations of Claim 13, Applicants submit that dependent Claims 14-20 likewise are patentable over Raz in view of Buzsaki.

For the reasons set forth above, Applicants respectfully request that the Section 103 rejection of Claims 1-20 be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,



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